III. REMARKS

Status of the Claims

Independent claims 1, 15, 29, 43, and 63 are amended. Dependent claims 2, 4, 6, 7, 12-14, 16, 18, 21, 26-28, 30, 32, 35, 40-42, 47, 49, 52, and 56-58 are also amended. Claims 3, 11, 17, 19, 25, 31, and 48 are cancelled. Claims 1, 2, 4-10, 12-16, 18-24, 26-30, 32-38, 40-43, 45-47, 49-58, and 61-63 are presented for further consideration.

Applicant has amended the claims to clarify the novel features of the invention for which protection is sought in this application. Support for the amendments to the claims can be found in the specification, as filed on page 13, lines 19 - 36.

Applicant has considered the Examiner's comments set forth in the Office Action mailed January 9, 2008 and responds in detail below. Reconsideration of the application is respectfully requested in view of the amendments and the following remarks.

The Office Action

Claims 1, 3, 9, 12, 14, 15, 17, 23, 26, 28,29, 31, 37, 40, 42-43, 46, 48, 54, 56, 58, and 61-63, stand rejected under 35USC103(a) based on the combined teaching of the cited reference Meppelink et al, U.S. Patent No. 5,542,063 and Sullivan, U.S. Patent No. 5,737,557. The Examiner is respectfully requested to reconsider the rejection in view of the above amendments and the following remarks. This rejection is traversed on the following grounds:

The combined teaching of Meppelink and Sullivan does not render the above listed claims obvious because it fails to teach or otherwise suggest each and every limitation of the claims. It is well settled that in order to establish a prima facie case for obviousness, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, without reference to the disclosure of this application. (MPEP Section 2142) ***In re***

***Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). See MPEP § 2143 - § 2143.03 for decisions pertinent to each of these criteria."**

Claim 1 includes the following language:

> **"determining a view chain comprising at least two entries, each of said entries comprising an application identifier and a view identifier; wherein a view identified by said view identifier is associated with an application identified by said application identifier;**
>
> **passing said view chain to a view router from a first application;**
>
> **launching at least one first view, based on an entry in said view chain, automatically by said view router; and**
>
> **continuing said first application when at least part of said view chain has been processed."**

All of the independent claims 1, 15, 29, 43, and 63 of this application have equivalent limitations.

The combined teaching of Meppelink and Sullivan fails to disclose or suggest these features.

Meppelink discloses an input device emulator that comprises an interpreter for a windowed environment. The interpreter reads and executes commands from a file. The interpreter commands correspond to a variety of user interface control device actions and relate to the manipulation of the windowed environment and the entry of text via a keyboard. The interpreter simulates an actual user for mass-testing purposes.

Meppelink also discloses that the windowed environment comprises an application program that communicates with a window server program. The window server program constructs window user interface elements and represents information

obtained from the application program in these window user interface elements. The window server controls the display using lower level user interface display instructions. Normally, input from a user, via an I/O device, is processed in the window server program to map the user input, for example, mouse clicking at specified locations on the display, to user interface events raised to the application program, such as the selection of a menu item. However, in Meppelink, in order to support mass-testing of user interfaces, an input device emulator is coupled to the window server to simulate user actions. The user actions are read from a test script. The benefit of placing a user interface emulator between the stream modules and the window server is that, whether a user interface action indication originates from an actual user or from an emulator script, may be hidden from the window server. Thus software testing may be made more easy.

Sullivan discloses a windowed environment where a number of collective actions may be associated with the files contained in a software suite. A software suite is a file and program folder displayed to the user as an icon that may be expanded to a window by user selection (Sullivan, column 5, lines 58 — 60). It comprises files from different file system directories. Each software suite has associated with it a storage element in which is stored contextual information for defining the appearance and behavior of the software suite window. A spot interface is designed to float on top of the desktop and all open windows.

The placement of the mouse pointer symbol over the spot interface results in a display of a circular visual element that encircles the spot interface. The circular visual element, consists of a collar divided into four quadrants, each of which correspond to a secondary user interface. The selection of a quadrant in the collar results in the display of a secondary user interface that comprises a number of icons used to start an application or to open a file. Therefore, Sullivan discloses only that a program or a file may be started or opened by clicking a mouse button while the mouse cursor is over the corresponding icon.

The combined teaching, therefore fails to disclose or suggest the features of the independent claims as amended.

Meppelink fails to disclose or suggest a view route that includes entries that have application identifiers. Meppelink does not disclose or suggest that the sequence of simulated user interface actions of Meppelink, may be grouped into at least two entries, each of which comprise application identifiers and view identifiers. In Meppelink, the sequence of simulated user interface actions merely specifies applications implicitly by way of mouse pointer location information, as appreciated by a person skilled in the art. Meppelink further fails to disclose that an entry specifies a view identifier in association with an application identifier. The teaching of Sullivan fails to remedy these deficiencies. Therefore the combined teaching fails to support the rejection of claims 1, 3, 9, 12, 14, 15, 17, 23, 26, 28,29, 31, 37, 40, 42-43, 46, 48, 54, 56, 58, and 61-63 based on obviousness.

Further, the view router of Meppelink is actually a combination of a write channel and a read channel, which has the capability of redirecting simulated input device messages to the read channel (Meppelink, column 4, row 61 to column 5, row 9). The view router in Meppelink does not launch views and does not perform the launching of views automatically, since the view router in Meppelink is only a channel for storing data, which may be implemented as a passive memory buffer or array, as appreciated by a person skilled in the art. The Examiner's construction is not completely clear in what sense the routing of the simulated input device messages to a window server or the routing of real input/output device messages between stream modules and the window server discloses a view chain comprising at least one view.

The applicant again emphasizes that, according to the amended language of the claims, the claims include a view chain comprising at least two entries, each of said entries comprising an application identifier and a view identifier, wherein a view identified by

said view identifier is associated with an application identified by said application identifier. In this regard, it should be noted that the automatic launching of at least one view in a view chain is not taught by Sullivan. In Sullivan windows are launched in response to input from a user, for example, the placement of a mouse pointer in one of the quadrants in a collar (Sullivan, column 5, rows 33 — 35) or the selection of one of the access buttons (Sullivan, column 40 — 42).

Sullivan also fails to teach the automatic launching of at least one view by a view router. Sullivan fails to disclose a view router. The passages cited by the Examiner in Sullivan fail to disclose anything that could be interpreted as a view router. Therefore, a person skilled in the art would not know how to apply Sullivan in Meppelink. Accordingly, the teaching of Sullivan fails to remedy the deficiencies of Meppelink as indicated above. Therefore the combined teaching does not support the rejection based on obviousness.

For all of the above reasons, applicants respectfully submit that the amended independent claims 1, 15, 29, 43, and 63 are patentable over the combined teaching of Meppelink in view of Sullivan.

Dependent claims 2-10, 12-14, 16-24, 26-28, 30-38, 40-42, 45-58, 61 and 62 depend on one of the independent claims, either directly or via intervening claims, and therefore, contain all of the limitations of the independent claims. The combined teaching therefore, fails to render the dependent claims obvious.

Claims 2, 4-8, 10, 13, 16, 18-22, 24, 27, 30, 32-36, 38, 41, 45, 47, 49-50, 51-53, 55, and 57 stand rejected based on the combined teaching of Meppelink and Sullivan and further in view of Bahrs, U.S. Patent No. 7,181,686. This rejection is traversed on the following grounds:

The combined teaching of Meppelink and Sullivan in view of Bahrs does not render the listed claims obvious because it fails to teach or otherwise suggest each and every limitation of the claims. It is well settled that in order to establish a *prima facie* case for obviousness, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, without reference to the disclosure of this application. (MPEP Section 2142) ***In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). See MPEP § 2143 - § 2143.03 for decisions pertinent to each of these criteria."**

The combined teaching of Meppelink, Sullivan, and Bahrs fail to disclose or suggest the features of the independent claims for the reasons stated above, because the disclosure of Bahrs fails to remedy the deficiencies of the combined teaching of Meppelink and Sullivan.

The rejection is further traversed on the following grounds. The disclosure of Bahrs fails to disclose or suggest the following limitation of claims 2, 16, 30, and 47 as amended:

> **"gathering data from said at least one first view; and passing said data from said view router to said first application or to a subsequent application in said view chain."**

This language is contained in all of the above claims listed by the Examiner either by dependency or otherwise.

Bahrs disclose a method and apparatus for presenting a set of screens in a graphical user interface for a data processing system. The system is for use in a distributed user environment comprising multiple clients and server processors. Out of the 155 page document, the examiner has cited lines 20-30 of column 4 of Bahrs and based on this excerpt has characterized the disclosure as follows:

"Bahrs discloses a data collection method from user and processing such data."

The reference Bahrs is a data processing system and the Examiner cites Bahrs as a disclosure of such a system in its broadest sense. Applicant does not claim a generic data processing method, but merely a specific step, program code, method, and device as part of processing data input from multiple applications having different views. The language of the claims indicated above, describes how data may be gathered from one view of one application and routed through a view router to other applications. Bahrs fails to disclose or suggest this feature and therefore the combined teaching fails to render the claimed subject matter of claim 2 obvious.

The reference Bahrs discloses a method and apparatus for a client development architecture that facilitates creating thin clients in a manner in which component reuse is increased and client development time is reduced. A graphical user interface is created, which comprises a plurality of components. Processes for presenting the plurality of the components and receiving user input are handled by a first set of graphical objects, wherein in response to a selected user input, a first event is generated.

An application object is created in which the graphical objects present the set of components and process the event and wherein the application generates a second event. A transport object is created, in which the transport object processes the second event and forwards the second event for processing in a destination within a plurality of destinations. Further, a container is displayed in a graphical user interface from a set of containers, wherein a display of the container handled by a view controller from a set of view controllers. Each view controller handles the display of an associated container within the set of containers and user input for the associated container. A display of the set of containers is altered by an application mediator, in which the set of containers are displayed in an order determined by the application mediator. Responsive to receiving a selected user input to a container, a view event is sent from a view

controller to an application mediator. The view event identifies an action taken to generate the selected user input.

These grounds apply equally to the rejected dependent claims 4-7, 18-24, 26-28,32-38,49-52, all of which, by dependency, have the limitations described in dependent claims 2,16,30, and 47. Further, the cited reference Bahrs fails to remedy the deficiencies of the primary combined teaching of Meppelink and Sullivan.

For all of the above reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,



9 April 2008
Date

Geza C. Ziegler, Jr.
Reg. No. 44,004

Perman & Green, LLP
425 Post Road
Fairfield, CT 06824
(203) 259-1800
Customer No.: 2512